

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATE OF AMERICA)
)
vs.) No. 02-CR-30043-05-MAP
)
MICHAEL QUICKEL,)
)
Defendant)

DEFENDANT'S MOTION TO CONTINUE SENTENCING HEARING

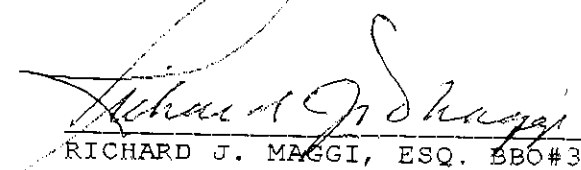
Defendant moves this honorable Court to continue the hearing on his sentencing, presently scheduled for April 14, 2006, to a later date.

As grounds, Defendant states that due to both illness and bad weather he has been unable to work, and as a result does not have the necessary funds to travel to Massachusetts from Pennsylvania at this time. He has also been unable to borrow the money.

The U.S. Attorney does not object to allowance of this request. If allowed by the Court, Defendant offers April 26, 28, May 1, 5, 8, 9 or 10 as alternative dates for sentencing.


Respectfully,

MICHAEL QUICKEL, Defendant
By Counsel:


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CERTIFICATE OF SERVICE

I hereby certify to proper service of a copy hereof on the Government by facsimile to the local office of the U.S. Attorney on April 10, 2006.


RICHARD J. MAGGI, ESQ.